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15 *Attorneys for Boston Heart Diagnostics*  
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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BOSTON HEART DIAGNOSTICS  
CORPORATION,

Plaintiff,

vs.

MD LABS, INC.

Defendant.

Case No.: 3:18-cv-00006

**STIPULATION TO EXTEND DEADLINE  
FOR PLAINTIFF TO FILE RESPONSE  
TO DEFENDANT'S MOTION TO  
DISMISS**

**(FIRST REQUEST)**

Pursuant to LR 6-1 and LR 26-4, undersigned Plaintiff and Defendant hereby submit the following stipulation and proposed order extending the deadline for Plaintiff Boston Heart Diagnostics Corporation ("Plaintiff") to file a Response to *Defendant's Motion to Dismiss Under Fed. R. Civ. P. 12(b)(6) and Memorandum in Support*, filed February 20, 2018. See ECF No. 24 ("Motion to Dismiss"). Pursuant to this Stipulation, Defendant's counsel has agreed

1 that Plaintiff shall have up to and including March 13, 2018 to file its Response.

2 The following is stated in support of this Stipulation:

- 3 1. On February 20, 2018, Defendant filed *Defendant's Motion to Dismiss Under Fed.*  
4 *R. Civ. P. 12(b)(6) and Memorandum in Support.* See ECF No. 24 (the "Motion to  
5 Dismiss").
- 6
- 7 2. The current deadline for Plaintiff to file a response to the Motion to Dismiss is  
8 March 6, 2018.
- 9
- 10 3. Before filing this Stipulation, counsel for Plaintiff contacted counsel for Defendant  
11 by e-mail on March 5, 2018 and requested a short extension until March 13, 2018  
12 to file the Response to the Motion to Dismiss. Defendant's counsel agreed to this  
13 requested extension.
- 14
- 15 4. Based on the above, the undersigned Parties have agreed the deadline for  
16 Plaintiff's Response to Defendant's Motion to Dismiss may be extended until  
17 March 13, 2018.
- 18
- 19 5. No schedule has been set in this matter, and therefore this extension will not  
20 interfere with any scheduled dates.

21 Undersigned counsel for Plaintiff respectfully submits good cause exists and requests  
22 the Court grant the requested extension.

23 WHEREFORE, Plaintiff and Defendant request entry of an Order granting an  
24 extension for Plaintiff to file its Response to Defendant's Motion to Dismiss until and  
25 including March 13, 2018.

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1 DATED: July 6, 2016

2 **HUMPHREY LAW PLLC**

3 **PERKINS COIE LLP**

4 By: /s/ L. Edward Humphrey  
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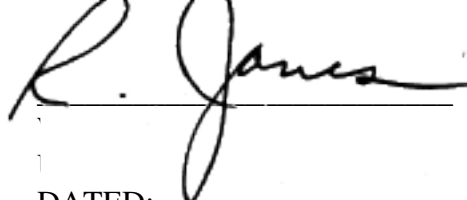
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17 *Attorneys for Boston Heart*  
18 *Diagnostics Corporation*

*Attorneys for MD Labs, Inc.*

21 **IT IS SO ORDERED:**

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25 DATED: — **March 9, 2018**

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- **STIPULATION TO EXTEND DEADLINE FOR PLAINTIFF TO FILE RESPONSE TO DEFENDANT’S MOTION TO DISMISS**, filed March 6, 2018.

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DATED: March 6, 2018.

By: /s/ *Caroline Carter*  
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 Caroline Carter, Paralegal